

## REMARKS

In the January 12, 2006 Office Action, the Examiner noted that claims 1-19 were pending in the application and were rejected under 35 USC § 103(a). In rejecting the claims, U.S. Patents 6,233,471 to Egger et al. (Reference A in the November 17, 2003 Office Action) and 6,289,342 to Lawrence et al. (Reference B in the January 4, 2005 Office Action) were cited. Claims 1-19 remain in the case. The Examiner's rejections are traversed below.

The claims continue to be rejected over the same combination of Egger et al. and Lawrence et al. as in the January 4 and June 28, 2005 Office Actions. The rejection of the claims was the same as in the June 28, 2005 Office Action; only the Response to Arguments in item 6 on page 12 was changed. In the Response to Arguments it was explained that the words in the claims and prior art were being interpreted broadly enough to support the rejection and cited one of the places (column 14, lines 21-26) where the word "pattern" is used in Egger et al.

### Request for Examiner Interview

Based on the statements in the Response to Arguments, Applicant understands that the issue is that the Examiner is interpreting the claims more broadly than intended and interpreting the prior art in a manner that Applicant believes is contrary to the meaning of the words to one of ordinary skill in the art. This Amendment includes amendments to claims 1 and 19 to present alternative language for consideration by the Examiner in an effort to identify language that will not be interpreted so broadly as to read on the significantly different teachings of Egger et al. and Lawrence et al.

The Examiner is respectfully requested to contact the undersigned by telephone to arrange an Examiner Interview prior to issuance of another Office Action to discuss what further changes are needed to avoid the excessively broad interpretation that has been used. Further discussion of the differences between the invention and the prior art, as represented by Egger et al. and Lawrence et al. is provided below to aid in the process of finding claim language that will be allowed as a result of the Examiner Interview.

### Interpretation of Prior Art

In the last paragraph on page 12 of the January 12, 2006 Office Action, it was asserted that "col. 13, lines 51 *et seq.* [of] Egger et al. discloses that textual objects include words, phrases, paragraphs, or portions of other full textual objects. These full textual objects are then related to one another through a myriad of 'patterns' (see col. 14 lines 21-26)." The cited portion

of column 14 of Egger et al. states "Any two textual objects may be related to each other through a myriad of 'patterns.' Empirical research demonstrates that eighteen patterns capture most of the useful relational information in a cross-referenced database 54. A list of these eighteen patterns, in order of importance, follows" with 18 examples listed, all of which only indicate the route taken in pointing from one reference to another. Nothing has been cited or found in Egger et al. to suggest broadening the meaning of "patterns" beyond the routes taken from one textual object to another, as in the 18 examples.

In rejecting claim 1, it was asserted that column 6, lines 34-37 of Lawrence et al. discloses that the "context may contain *reasons for citation* by a referring document such as a brief summary of the paper, another author's response to the paper, or a subsequent work which builds upon the original article" (Office Action, page 4, lines 8-10). However, all that is disclosed at this portion of Lawrence et al. is that "it is possible to display the context of how the paper is cited in subsequent publications" (column 6, lines 34-36). While this may be useful to the user, it does not suggest that the system is or could be modified to be capable of **identifying** a reason for citation, so that the system could serve as a "reference reason identifying apparatus" (claim 1, line 1) or that Lawrence et al. teaches or suggests "a reference feature/reference reasons correspondence table indicating correspondence between reference features and reference reasons" (claim 1, lines 2-3).

### **Distinctions over Prior Art Recited in Amended Claims**

Claim 1 has been amended to clarify the meaning of "reason" as "at least one of answer, application, basic, contraposition, human, related work, review, software, technique, weak correlation and similar" (claim 1, lines 11-13). These examples of reasons can be found at pages 32-33 of the specification. It is noted that this portion of the specification defines "review" as related to a document "cited in order to introduce the review of a specific field" (specification, page 33, lines 10-11), not a document that is reviewing another document. It should be clear that storage of information to enable "display [of the] the context of how the paper is cited in subsequent publications" as taught by Lawrence et al. is not related to or suggestive of identifying or storing information corresponding to any of the reasons listed in amended claim 1.

For the above reasons, it is submitted that claim 1, as well as claims 2-3 which depend therefrom, patentably distinguish over Egger et al. and Lawrence et al.

Claim 19 has been amended to recite "where the referred document is cited in the document data by searching the document data for a pattern which matches one of the character

string patterns" (claim 19, lines 8-10), where "the character string patterns" are "likely to appear in the given document data" (claim 19, line 6) and are included in "pattern information ... indicating documents that are cited" (claim 19, lines 5-7). As discussed above, the use of the term "patterns" in Egger et al. to different routes from one textual object points to another, has nothing to do with matching "character string patterns" as now recited in claim 19. Therefore, it is submitted that claim 19 patentably distinguishes over Egger et al. and Lawrence et al.

#### **Offer to Further Amend Claims**

During the Examiner Interview requested above, the possibility of further amendments, particularly to independent claims 4, 5, 10 and 12-18, can be discussed. The January 12, 2006 Office Action did not respond to the argument in the Amendment filed September 28, 2005 (entered by the Request for Continued Examination filed November 9, 2005) that claims 5 and 12-18 distinguish over the prior art by reciting that the "reason why a referred document is cited" (e.g., claim 5, line 6) is "retrieved from the reference feature/reference reason correspondence table using a feature of the specific document in the neighborhood of the position as a reference feature" (e.g., claim 5, lines 7-9). Nothing has been cited or found in Egger et al. or Lawrence et al. suggesting that any sort of "feature of the specific document in the neighborhood of a position" is used "as a reference feature." Until this argument is rebutted, Applicants contend that claims 5 and 12-18, as well as claim 4 which recites similar limitations, should be allowed without further amendment.

#### **Summary**

It is submitted that the references cited by the Examiner, taken individually or in combination, do not teach or suggest the features of the present claimed invention. Thus, it is submitted that claims 1-19 are in a condition suitable for allowance. Entry of the Amendment, reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

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If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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